

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:23-cv-00108-LMB-JFA

DECLARATION OF ELIZABETH DOUGLAS

I, Elizabeth Douglas, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. Since September 2017, I have been the CEO of wikiHow, which is an online platform for creating and sharing how-to guides with around 50 million unique monthly visitors.
2. From 2009 to 2017, I was the COO of wikiHow and I managed its digital ad stack in its entirety.
3. I understand that there is a dispute over whether, as a customer of Google Ad Manager, wikiHow's views on Plaintiffs' proposed remedies will be heard by the Court. I am providing this declaration in support of my views.
4. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge. If called upon as a witness in this action, I could and would testify competently thereto.
5. wikiHow is a longstanding customer of Google Ad Manager and uses Google Ad Manager to serve display ads on its website through primarily programmatic methods. wikiHow does not use another external ad server but receives demand from non-Google sources such as

Prebid and Amazon's Transparent Ad Marketplace (TAM). Some of Google's and Plaintiffs' proposed remedies, such as proposed integrations with Prebid, which wikiHow already uses, may be beneficial for wikiHow. But a potential divestiture of Google Ad Manager's ad exchange or ad server functionality through Google Ad Manager, as proposed in Plaintiffs' Proposed Final Judgment, may harm wikiHow's business in both the short and long term for several reasons.

6. wikiHow has found Google Ad Manager to be easy to use and optimize, and it benefits from the fact that it can use Google Ad Manager for minimal cost. Google Ad Manager's rich, simple, and user-friendly features - including a single interface for both its ad server and ad exchange functionality - have allowed wikiHow to efficiently monetize its website. wikiHow benefits from the integration of Google's ad server and exchange and separating it into two products owned by separate companies may make wikiHow's digital ad operations much more complicated and costly.

7. wikiHow relies on advertising revenue to operate its business. Google Ad Manager has proven extremely effective at generating revenue from selling wikiHow's ad space and has allowed wikiHow to scale its business. If Google is required to divest Google Ad Manager's ad exchange and/or ad server functionality, I am concerned about the alternative options wikiHow will have to replace the benefits Google Ad Manager has historically generated for the company. Such a change to wikiHow's ad monetization operations would require extensive testing and analysis, which would divert valuable resources from wikiHow's core business strategy.

8. The open web is transforming in response to artificial intelligence, and publishers like wikiHow are struggling to maintain the same level of user traffic and ad sales that they once

had. If Google is required to divest Google Ad Manager's ad exchange and/or ad server functionality, wikiHow would need to devote resources to exploring how to replace Google Ad Manager rather than addressing the impact of these major industry changes on wikiHow's business.

9. Although I reside in Los Altos, California, I am prepared to travel to Virginia to testify because of the significant impact the remedies decided in this case will have on wikiHow's business. Should the Court allow me to testify, before I do so, I will need a couple of details about wikiHow relevant to ongoing business-sensitive negotiations to be sealed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2025 in Los Altos, California.



Elizabeth Douglas